

authorized to access the network devices. In rejecting the claims, the Office Action asserts that this subject matter is disclosed in the Aldred patent, with specific reference to Figures 1, 2 and 7, as well as column 3, line 64 to column 4, line 20, and column 6, lines 51-60. In the cited passage at columns 3 and 4, the Aldred patent discloses the general structure of a directory tree. It does not, however, disclose a directory having the particular features recited in the claim, namely a root node, a first level of nodes below the root node *associated with respective organizations*, and at least one further level of nodes *that identify users who are authorized to access the network devices*.

Insofar as access control is concerned, the Aldred patent discloses the use of access control lists (ACLs), beginning at column 4, line 65. Referring to the disclosure beginning at column 5, line 17, as well as Figure 5, the Aldred patent discloses that the ACL information is stored in a relational database management system 39. The passage at column 6, lines 51-60, cited in the Office Action, relates to one of the tables that are stored in the relational database.

Thus, unlike the claimed subject matter, the Aldred patent does not disclose that access control information is contained at certain nodes within the directory tree itself. Rather, the patent is representative of the prior art described in the background portion of the present application, in which access control information is stored in a database. As can be seen in Figure 5, the database 39 is distinct from the directory server 37.

Since the Aldred patent does not disclose a directory structure that is arranged in the manner recited in claim 9 to store access information, it also does not disclose other features recited in the claims. For example, claim 9 recites a step

which is responsive to a request by a user for access to one of the network devices to determine the organization to which that device is assigned and "whether said user is identified on a node below the first-level node associated with the determined organization." Rather, in a system of the Aldred patent, access control is determined with reference to the permissions table 47 stored in the relational database. It does not determine whether a user is identified on a node at a particular level of the directory tree.

It is respectfully submitted that the Byrne patent does not overcome these differences between the claimed subject matter and the disclosure of the Aldred patent. The Byrne patent was cited for its disclosure of replicating authentication information at individual servers. However, it does not disclose the use of a directory structure to maintain that information, in the manner recited in claim 9.

Accordingly, it is respectfully submitted that the Aldred and Byrne patents, whether considered individually or in combination, do not suggest the subject matter of claim 9 to a person of ordinary skill in the art. For at least some of these same reasons, the subject matter of claims 16 and 21, as well as their dependent claims, is likewise not suggested.

In the rejection of claims 13, 19 and 24, the Pang patent was cited as disclosing at least two replicated copies of a directory structure, and distributing access requests among the replicated copies by means of a load balancer. While the cited passage at column 23, lines 50-64, discloses the use of a load balancing scheme to balance the workload of multiple authentication hosts, it does not disclose the use of a directory structure to store the identification of users who are authorized to access network resources, as discussed above. Accordingly, it is respectfully

submitted that the Pang patent also does not overcome the distinctions between the claimed subject matter and the disclosure of the Aldred patent.

For at least these reasons, therefore, it is respectfully submitted that the subject matter recited in the pending claims is patentably distinct from the disclosures of the Aldred, Byrne and Pang patents, whether considered individually or in combination. Reconsideration and withdrawal of the rejections is respectfully requested.

Should any questions arise in connection with this application, or should the Examiner believe a telephone conference would be helpful in resolving any remaining issues pertaining to this application, the undersigned respectfully requests that he be contacted at the number indicated below.

Respectfully submitted,

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